

KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

MARTIN J. KRAVITZ, ESQ.  
Nevada Bar No. 83  
L. RENEE GREEN, ESQ.  
Nevada Bar No. 12755  
KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 So. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
Telephone: (702) 362-6666  
Facsimile: (702) 362-2203  
mkraivtz@ksjattorneys.com  
rgreen@ksjattorneys.com

*Attorneys for Defendants,  
ACCESS MEDICAL, LLC and  
ROBERT "SONNY" WOOD*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NAUTILUS INSURANCE COMPANY,

Case No.: 2:15-cv-00321-JAD-GWF

Plaintiff,

vs.

ACCESS MEDICAL, LLC; ROBERT  
CLARK WOOD, II; FLOURNOY  
MANAGEMENT, LLC; and DOES 1-10,  
inclusive,

Defendants.

**SECOND MOTION AND PROPOSED ORDER  
TO WITHDRAW AS COUNSEL OF RECORD**

MARTIN J. KRAVITZ, ESQ. and L. RENEE GREEN, ESQ., respectfully move this court for an order permitting Martin J. Kravitz, Esq. and L. Renee Green, Esq. (Counsel) to withdraw as counsel for Plaintiff, ROBERT "SONNY" WOOD, an individual, and ACCESS MEDICAL, LLC, a Delaware Limited Liability Corporation.

///

///

///

///

1 This Motion is made and based upon the Memorandum of Points and Authorities  
2 submitted herewith, Local Rule IA 11-6 and (e), the Declaration of Martin J. Kravitz, Esq.  
3 attached hereto, and the pleadings and papers on file herein.

4 DATED this 1st day of December, 2021.

5 KRAVITZ SCHNITZER JOHNSON  
6 WATSON & ZEPPENFELD, CHTD.

7 By: /s/ Martin J. Kravitz, Esq.

8 MARTIN J. KRAVITZ, ESQ.  
9 Nevada Bar No. 83  
10 L. RENEE GREEN, ESQ.  
11 Nevada Bar No. 12755  
12 8985 So. Eastern Avenue, Suite 200  
13 Las Vegas, Nevada 89123  
14 *Attorney for Defendants*

12 **DECLARATION OF MARTIN J. KRAVITZ, ESQ.**

13 I, Martin J. Kravitz, hereby declare under penalty of perjury as follows:

14 1. I am Senior Partner in the law firm of Kravitz Schnitzer Johnson Watson &  
15 Zeppenfeld, Chtd., formerly known as Kravitz, Schnitzer & Johnson, Chtd.

16 2. I am knowledgeable about all matters set forth in this Declaration and know them  
17 to be true, except where stated upon information and belief, and in those instances I believe them  
18 to be true.

19 3. This firm has been co-counsel in this matter with Jordan P. Schnitzer, Esq.,  
20 representing the Defendants, ROBERT “SONNY” WOOD, and ACCESS MEDICAL, LLC.  
21 When the Nevada Supreme Court accepted the Certified Question in late 2019 in Case No.  
22 79130, it was our intent to disassociate as counsel in all of pending cases involving Mr. Wood  
23 and Access Medical. On January 21, 2020, a Stipulation of Change of Counsel to remove the  
24 Martin J. Kravitz, Esq. and L. Renee Green, Esq. was filed in the Nevada Supreme Court, and  
25 thereby relieving responsibility in that case.

26 4. In this matter, we have not communicated with Mr. Wood for approximately two  
27 (2) years. All work on behalf of Defendants have been handled solely by Jordan P. Schnitzer of  
28 The Schnitzer Law Firm.

KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

5. L. Renee Green, Esq. has now left my firm. I hereby request the Court grant the Motion to Withdraw as Counsel for Defendants, and remove me and L. Renee Green from the service list.

6. The last known address for Mr. Wood and Access Medical, LLC is:

Robert "Sonny" Wood  
4955 S. Durango Dr. Suite 180  
Las Vegas, NV 89113

Access Medical, LLC  
4955 S. Durango Dr. Suite 180  
Las Vegas, NV 89113

7. There is no prejudice in granting this Motion to Withdraw as Defendants will continue to be represented by Jordan P. Schnitzer, Esq.

I declare under penalty of perjury the foregoing is true and correct.

DATED this 1st day of December, 2021.

/s/ Martin J. Kravitz  
MARTIN J. KRAVITZ

### **MEMORANDUM OF POINTS AND AUTHORITIES**

The United States District Court Local Rules IA 11-6 provides that an attorney may withdraw from representation of a client under certain circumstances. Specifically, Local Rule IA 11-6(b) states:

If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel. The affected client may, but is not required to, file a response to the attorney's motion within 14 days of the filing of the motion, unless the court orders otherwise.

Local Rule IA 11-6(e) further provides: "Except for good cause shown, no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case."

///

1 Good cause exists to allow Martin J. Kravitz, Esq. and L. Renee Green, Esq. to withdraw  
2 as *co-counsel* for Defendants as outlined in the Declaration of Martin J. Kravitz, Esq. There will  
3 be no delay in the proceeding as Jordan P. Schnitzer, Esq. will remain counsel for Defendants.

4 **CONCLUSION**

5 Based upon the foregoing, Martin J. Kravitz, Esq. and L. Renee Green, Esq. respectfully  
6 request that this Court grant their Motion to Withdraw as counsel for Defendants, ROBERT  
7 “SONNY” WOOD, and ACCESS MEDICAL, LLC.

8 DATED this 1st day of December, 2021.

9  
10 KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.

11  
12 By: /s/ Martin J. Kravitz, Esq.

13 MARTIN J. KRAVITZ, ESQ.  
Nevada Bar No. 83  
14 L. RENEE GREEN, ESQ.  
Nevada Bar No. 12755  
15 8985 So. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123

16 **ORDER**

17 **IT IS SO ORDERED**

18 **DATED:** 10:28 am, December 02, 2021

19 

20 **BRENDA WEKSLER**  
21 **UNITED STATES MAGISTRATE JUDGE**  
22  
23  
24  
25  
26  
27  
28

KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

KRAVITZ SCHNITZER JOHNSON  
WATSON & ZEPPENFELD, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of December, 2021, pursuant to Local Rule 5.1, I serviced the foregoing **SECOND MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**, via the Court's CM/EMF electronic filing system addressed to all parties on the e-service list and by mail, as follows:

Jordan P Schnitzer [Jordan@theschnitzerlawfirm.com](mailto:Jordan@theschnitzerlawfirm.com), [melisa@theschnitzerlawfirm.com](mailto:melisa@theschnitzerlawfirm.com),  
[olivia@theschnitzerlawfirm.com](mailto:olivia@theschnitzerlawfirm.com)

Eric Sebastian Powers [Eric.powers@ericpowerslaw.com](mailto:Eric.powers@ericpowerslaw.com)

Linda W. Hsu [lhsu@selmanlaw.com](mailto:lhsu@selmanlaw.com), [psmith@selmanlaw.com](mailto:psmith@selmanlaw.com), [slipsitz@selmanlaw.com](mailto:slipsitz@selmanlaw.com)

Robert "Sonny" Wood  
4955 S. Durango Dr. Suite 180  
Las Vegas, NV 89113

Access Medical, LLC  
4955 S. Durango Dr. Suite 180  
Las Vegas, NV 89113

Flournoy Management, LLC  
8550 W. Charleston Blvd.  
Suite 102-355  
Las Vegas, NV 89117

/s/ Cynthia Lowe

An employee of Kravitz Schnitzer Johnson  
Watson & Zeppenfeld, Chtd.